

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ISRAEL BOLLAG, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-3994 (LTS)

JURY TRIAL DEMANDED

(Captions continued on following pages)

**DECLARATION OF KIM E. MILLER IN SUPPORT OF THE MOTION OF THE YEN
GROUP TO CONSOLIDATE RELATED ACTIONS; TO BE APPOINTED LEAD
PLAINTIFF; AND TO APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE OF
COUNSEL**

LEO YEN, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, ZHU
SHAN, GRAHAM EARNSHAW,
ALOYSIUS T. LAWN, JOHN H.
SPRINGER, ZHAO LI, LONG QIU YUN,
J.P. MORGAN SECURITIES, INC., UBS
AG, CIBC WORLD MARKETS CORP.,
WR HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4046 (LTS)

JURY TRIAL DEMANDED

JOEL DARRAS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4144 (LTS)

JURY TRIAL DEMANDED

ALTON PARTNERS, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL,

Defendants.

CIVIL ACTION NO. 07-cv-4443 (LTS)

JURY TRIAL DEMANDED

BRICKMAN INVESTMENTS, INC.,
Individually And On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4719 (LTS)

JURY TRIAL DEMANDED

BLOOMFIELD, INC., Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-4727 (LTS)

JURY TRIAL DEMANDED

JIAJU CHU, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD.,
FREDY BUSH, SHELLY SINGHAL, J.P.
MORGAN SECURITIES, INC., UBS AG,
CIBC WORLD MARKETS CORP., WR
HAMBRECHT + CO., LLC,

Defendants.

CIVIL ACTION NO. 07-cv-6145 (LTS)

JURY TRIAL DEMANDED

I, Kim E. Miller, hereby declare as follows:

1. I am a member in good standing of the bar of New York. I am a member of the law firm of Kahn Gauthier Swick, LLC, proposed Lead Counsel for Movant, the Yen Group. I submit this declaration in support of the motion filed by the Yen Group to: (1) consolidate all related cases; (2) to be appointed as Lead Plaintiff; and (3) approve Lead Plaintiff's selection of Lead Counsel for the Class.

2. Attached as exhibits are true and correct copies of the following:

Exhibit A: Certifications and loss chart of the Yen Group with detailed listing of transactions.

Exhibit B: Published Notice on *Market Wire* on May 22, 2007, of the first securities class action complaint filed in this matter in the United States District Court for the Southern District of New York.

Exhibit C: Firm Biography for Proposed Lead Counsel, Kahn Gauthier Swick, LLC.

I declare under penalty of perjury under the laws of the state of New York that the foregoing facts are true and correct. Executed this 23rd day of July, 2007, at New York, New York.

DATED: July 23, 2007

/s/ Kim E. Miller

KIM E. MILLER